

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALEXANDER WILLIAMS

Plaintiff,

- v -

Index No. 19-CV-03347 (LJL) (JLC)

CITY OF NEW YORK et al.,

Defendants.

DECLARATION OF HILLARY S. BLACK

Hillary S. Black declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an Associate at the firm Paul, Weiss, Rifkind, Wharton & Garrison LLP and counsel of record for Plaintiff Alexander Williams in the above-captioned action. I respectfully submit this Declaration in support of Plaintiff's Motions in Limine.
2. Attached as Exhibit A is a true and correct copy of Plaintiff's lockdown order, as filed in connection with Defendants' Motion for Summary Judgment at Dkt. 160-1, which Defendants have identified in the Proposed Joint Pretrial Order as exhibit DEF 1.
3. Attached as Exhibit B is a true and correct copy of Plaintiff's lockdown order, as filed in connection with Defendants' Motion for Summary Judgment at Dkt. 159-3, which Defendants have identified in the Proposed Joint Pretrial Order as exhibit DEF 2.
4. Attached as Exhibit C is a true and correct copy of excerpts from the deposition transcript of Plaintiff Alexander Williams, dated January 11, 2021.

5. Attached as Exhibit D is a true and correct copy of excerpts from the deposition transcript of Plaintiff Alexander Williams, dated January 12, 2021.
6. Attached as Exhibit E is a true and correct copy of excerpts from the deposition transcript of Samuel Ceruti, dated January 27, 2023.
7. Attached as Exhibit F is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000863.
8. Attached as Exhibit G is a true and correct copy of excerpts from the deposition transcript of Lucie Doliscar, dated December 1, 2022.
9. Attached as Exhibit H is a true and correct copy of Plaintiff's proposed adverse inference instruction to the jury, as filed concurrently with this Declaration on March 20, 2023.
10. Attached as Exhibit I is a true and correct copy of the August 2, 2022 Letter from Robert O'Loughlin, as filed at Dkt. 209.
11. Attached as Exhibit J is a document produced by Defendants bearing Bates stamps DEF_0065 and DEF_0068, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 1.
12. Attached as Exhibit K is a document produced by Defendants bearing Bates stamp DEF_0066, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 2.

13. Attached as Exhibit L is a document produced by Defendants bearing Bates stamp DEF_0067, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 3.
14. Attached as Exhibit M is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000027, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 4.
15. Attached as Exhibit N is a document produced by Defendants bearing Bates stamp DEF_0715, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 5.
16. Attached as Exhibit O is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000024, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 6.
17. Attached as Exhibit P is a true and correct copy of Plaintiff's Complaint, as filed at Dkt. 2, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 7.
18. Attached as Exhibit Q is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000378, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 8.
19. Attached as Exhibit R is a true and correct copy of Plaintiff's Amended Complaint, as filed at Dkt. 9, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 9.

20. Attached as Exhibit S is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000572, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 10.
21. Attached as Exhibit T is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000686-87, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 11.
22. Attached as Exhibit U is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000685, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 12.
23. Attached as Exhibit V is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000431, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 13.
24. Attached as Exhibit W is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000244, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 14.
25. Attached as Exhibit X is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000621, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 15
26. Attached as Exhibit Y is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000432, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 16.

27. Attached as Exhibit Z is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000826, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 17.
28. Attached as Exhibit AA is a document produced by Plaintiff bearing Bates stamp WILLIAMS_00000385, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 19.
29. Attached as Exhibit BB is a true and correct copy of Defendant Mathis's Answer to Plaintiff's Amended Complaint, as filed at Dkt. 47, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 20.
30. Attached as Exhibit CC is a true and correct copy of the Court's December 16, 2019 Order, as filed at Dkt. 48, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 21.
31. Attached as Exhibit DD is a document produced by Defendants bearing Bates stamp DEF_1945, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 22.
32. Attached as Exhibit EE is a true and correct copy of Plaintiff's Response to Defendants' Motion to Dismiss, as filed at Dkt. 49, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 23.
33. Attached as Exhibit FF is a document produced by Defendants bearing Bates stamp DEF_2061, which was used as Exhibit 3 in the deposition of Captain Lucie Doliscar, and which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 24.

34. Attached as Exhibit GG is a true and correct copy of the August 2, 2022 Letter from Robert O'Loughlin and Exhibit A to the Letter, as filed at Dkt. 208 and Dkt. 208-1; Plaintiff has identified these documents together in the Proposed Joint Pretrial Order as exhibit PX 25.

35. Attached as Exhibit HH is a true and correct copy of the Court's August 4, 2022 Order, as filed at Dkt. 213, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 27.

36. Attached as Exhibit II is a true and correct copy of excerpts from the transcript of the August 4, 2022 telephonic case management conference, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 30.

37. Attached as Exhibit JJ is a true and correct copy of Defendants' August 31, 2022 Amended Rule 26 Disclosures, which Plaintiff has identified in the Proposed Joint Pretrial Order as exhibit PX 31.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: March 20, 2023

New York, New York

/s/ Hillary Black

Hillary S. Black